

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Grant Johnson,

Plaintiff,

Civil Action

Docket No. 1:22-cv-10861

v.

Esports Entertainment Group, Inc.,

Defendant.

PLAINTIFF’S REQUESTS TO DEFENDANT FOR PRODUCTION OF DOCUMENTS

31. Produce all documents related to the audit conducted by Friedman LLP (now merged with and known as Marcum LLP) and its auditors Willem VanderBerg and Justin VanFleet, which audit determined that no fraud had occurred despite the allegations of fraud in the March 28, 2022 letter from Alto Opportunity Master Fund, SPC – Segregated Master Portfolio B (“Alto”).

Response:

32. Produce all documents showing the gross revenue of Lucky Dino Gaming Limited (Lucky Dino) in 2019, 2020, 2021, and 2022, including annual financial statements, quarterly financial statements, tax returns, and Defendant’s consolidated financial statements.

Response:

33. Produce all documents showing the gross revenue of Bethard Group Limited (Bethard) in 2019, 2020, 2021, and 2022, including annual financial statements, quarterly financial statements, tax returns, and Defendant’s consolidated financial statements.

Response:

34. Produce Defendant’s consolidated financial statements for 2019, 2020, 2021, and 2022.

Response:

35. Produce all documents prepared by or in the possession of Dan Marks and/or Stuart Tilly which reflect the gross revenue of Lucky Dino Gaming Limited (Lucky Dino) in 2019, 2020, 2021, or 2022.

Response:

36. Produce all documents prepared by or in the possession of Dan Marks and/or Stuart Tilly which reflect the gross revenue of Bethard Group Limited (Bethard) in 2019, 2020, 2021, or 2022.

Response:

37. Produce all documents which reflect Defendant's auditors' determination of the gross revenue attributed to Bethard Group Limited (Bethard) and/or Lucky Dino Gaming Limited (Lucky Dino) in 2019, 2020, 2021, or 2022.

Response:

38. Produce all documents which reflect Defendant's Board of Directors' determination of the gross revenue attributed to Bethard Group Limited (Bethard) and/or Lucky Dino Gaming Limited (Lucky Dino) in 2019, 2020, 2021, or 2022.

Response:

Respectfully submitted,

/s/ Alan L. Frank

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May 18, 2023